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United States Department of the Interior

FISH AND WILDLIFE SERVICE

P.O. Drawer 1190

Daphne, AL 36526

August 11, 1992

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Ms. Cheryl W. Smith
Senior Remedial Project Manager
United States Environmental Protection Agency
345 Courtland Street Northeast
Atlanta, Georgia 30365

Dear Ms. Smith:

We have reviewed the Environmental Evaluation Technical Memorandum (EETM) of the Remedial Investigation (RI)/Feasibility Study (FS) at the McIntosh Plant Site, Olin Corporation, McIntosh, Alabama, and have the following comments.

Since this document presents no new data, the Fish and Wildlife Service (Service) maintains its comments in previous correspondence concerning the Olin Corporation RI/FS. Briefly, previous sampling efforts have consistently neglected the Tombigbee River (River), which we feel will not adequately determine the extent of mercury contamination through sediments and biota to Service Trust Resources.

After reviewing the proposed sampling activities of Phase 11 in Operable Unit 2 of the ecological assessment, our previous position stands concerning the lack of incorporation of the River into the proposed plan. Referring to our correspondence dated April 28, 1992, our rationale has been logically based on the reported mercury levels in the Olin Basin (Basin) sediments, the hydrology of the area, and the mobility of the associated aquatic biota. To verify this point, according to Table 17, at least three of the fish collected from the Basin are estuarine species (hogchoker, striped mullet and American eel), indicating faunal exchange between the River and the Basin during high water stages (4-6 months out of the year).

It was mentioned on page 57 of this document that further investigation into the lower reaches of the Tombigbee floodplain will be conducted to find a control site. The Service feels that in order to designate an area in the River which represents similar community structure yet is unaffected by mercury contamination, sampling efforts should be made throughout the area of the River adjacent to the Basin. By gathering data along a spatial gradient from the source of discharge to the outer reaches of mercury contamination in the River, not only can a control site can be properly designated, but a better evaluation of the potential impact to the biota can be made in the ecological assessment.

Finally, we feel that fish (i.e. largemouth bass and channel catfish) and organisms such as crawfish, frogs, snakes and worms which are prey to wading and migratory birds must be collected from the control and the Olin Basin sites for chemical analysis in order to properly assess relative mercury bioaccumulation in the upper food chain and to Service Trust Resources.

If sample stations in the River for sediment and biota are not incorporated into phase 11 of the ecological assessment, the time and expense of data collection and analysis is meaningless when attempting to quantify the extent of mercury contamination from the McIntosh Plant site.

As always, we appreciate the opportunity for comments.

Sincerely,

Larry E. Goldman
Field Supervisor